

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MATTHEW BATEMAN and	:	CHAPTER 13
BRENDA BATEMAN	:	
Debtors	:	
	:	
MATTHEW BATEMAN and	:	
BRENDA BATEMAN	:	
Movants	:	
	:	
vs.	:	
	:	
QUICKEN LOAN,	:	
HARFORD COUNTY TAX CLAIM	:	
BUREAU, HARFORD COUNTY	:	
SCHOOL DISTRICT and CHARLES	:	
J. DEHART, III, STANDING CHAPTER	:	
13 TRUSTEE	:	
Respondents	:	CASE NO. 1-18-bk-03445-HWV

TRUSTEE'S LIMITED OBJECTION TO "CORRECTED" DEBTORS' MOTION TO  
APPROVE SALE OF REAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS,  
ENCUMBRANCES AND OTHER INTERESTS  
(3957 BUSH COURT, HARFORD COUNTY, MARYLAND)

AND NOW, this 3rd day of February, 2020, comes Charles J. DeHart, III,  
Standing Chapter 13 Trustee for the Middle District of Pennsylvania, by and through his attorney,  
James K. Jones, and objects to Debtors' Motion for the following reasons:

1. Respondent is Charles J. DeHart, IIII, Standing Chapter 13 Trustee who is the duly appointed Trustee in this case.
2. Applicant is Sean Patrick Quinlan, Esquire who filed Debtors' Motion to Sell their real estate and distribute the proceeds.
3. Debtors' Motion to Sell 3957 Bush Court, Abingdon, Harford County, Maryland anticipates the distribution of non-exempt proceeds to unsecured claimants of debtors.
4. Paragraph 13 of Debtors' motion provides for the payment of up to \$3,000.00 for legal fees and expenses owed to Sean P. Quinlan and other professionals prior to the distribution of non-exempt proceeds to unsecured claims.
5. Under the terms of the paragraph, such fees are subject to such approval as the Bankruptcy Court may require.

6. Respondent believes it would be prudent for Applicant to escrow said fees and expenses following disbursement of the sale proceeds and thereafter file an application with this Court to approve reasonable compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses in regard to this transaction.

7. The undersigned discussed this motion with Applicant and he does not oppose the relief requested.

WHEREFORE, Respondent requests this Honorable Court to order Sean P. Quinlan, Esquire to escrow any proceeds received from the sale of 3957 Bush Court, Abingdon, Harford County, Maryland and to thereafter file an application with this Court to approve compensation for actual, necessary services rendered and reimbursement for actual, necessary expenses in regard to this transaction.

Respectfully submitted,

Charles J. Dehart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

BY: /s/James K. Jones  
Attorney for Trustee  
[jjones@pamd13trustee.com](mailto:jjones@pamd13trustee.com)

CERTIFICATE OF SERVICE

AND NOW, this 3rd day of February, 2020, I hereby certify that I have served the within Objection electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Sean Quinlan, Esquire  
2331 Market Street  
Camp Hill, PA 17011

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee